

### REMARKS

In the Office Action dated March 18, 2008, claims 1-30 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Application Publication No. 2003/0093320 (Sullivan) in view of U.S. Patent No. 6,993,502 (Gryglewicz).

Claims 12-14 have been cancelled, without prejudice.

Independent claim 1 has been amended to incorporate part of the subject matter of former dependent claim 2. The added subject matter recites that the generic controller is a class, and that the at least two controllers at different hierarchical levels are subclasses inherited from the generic controller class.

In the obviousness rejection of former dependent claim 2 over Sullivan and Gryglewicz, the Office Action cited the following passages of Sullivan as disclosing that the generic controller is a class, and that the at least two controllers are subclasses inherited from the generic controller class: Sullivan, ¶¶ [0126]-[0127]. These cited paragraphs of Sullivan refer to the fact that a general purpose computer system may be programmable using a computer programming language such as C, C++, Java, or other language, such as a scripting language or assembly language. Paragraph [0127] of Sullivan also notes that the processor of a general purpose computer system can be implemented with various different types of processors, and that such processors can execute operating systems. However, nowhere in either ¶ [0126] or ¶ [0127] of Sullivan is there any hint that a generic controller can be a class, and that at least two controllers at different hierarchical levels for defining an interface between a calling application and at least one callable application are subclasses inherited from the generic control class.

Gryglewicz also fails to disclose or hint at the subject matter of claim 1 that does not appear in Sullivan. Fig. 1 of Gryglewicz refers to a network taxation system 32 that includes various controllers 34 and a main controller 40. However, there is absolutely no hint given that the main controller 40 and controllers 34 are subclasses of a generic controller class.

Therefore, even if Sullivan and Gryglewicz could be hypothetically combined, the hypothetical combination of the references would clearly have not led to the claimed subject matter. Therefore, claim 1 is clearly non-obvious over Sullivan and Gryglewicz.

Amended independent claims 18, 27, and 30 are allowable over Sullivan and Gryglewicz for similar reasons as claim 1.

Claim 8 has been amended from dependent form to independent form (incorporating the subject matter of intermediate claim 7), with the scope of claim 8 remaining **unchanged**.

Claim 8 defines the relationship between the controller at the higher hierarchical level and the controller(s) at the lower hierarchical level. The controller at the higher hierarchical level is arranged for receiving an input request from the calling application and sending an output request to the controller at the lower hierarchical level, and receiving an output response from the controller at the lower hierarchical level as an input response. The controller at the lower hierarchical level is arranged for receiving the output request of the controller at the higher hierarchical level as an input request, sending an output request to the callable application or one or more of the callable applications to which it is associated, receiving an input response from the callable application or applications, and sending an output response to the controller at the higher hierarchical level.

As purportedly disclosing this subject matter of claim 8, the Office Action cited the following passages of Sullivan: ¶¶ [0047] and [0059]. Paragraph [0047] of Sullivan indicates that the transaction tax compliance system 200 records tax liability data for each transaction. The cited paragraph also notes that users of the transaction tax compliance system 200 may manually or automatically access the transaction data and/or the appropriate tax liability by requesting the information from the transaction tax processor 201, or by other means. There is absolutely no teaching or hint whatsoever in this passage of Sullivan of the recited inter-relationship between the controllers at the higher and lower hierarchical levels of claim 8.

The other paragraph cited by the Office Action, ¶ [0059], of Sullivan notes that the transaction tax compliance system 200, through an exemption manager 276, may communicate with or access a tax exemption warehouse 110 maintained by the tax transaction processor or a third party to verify any tax exemption status. The cited passage also notes that the exemption manager may receive information from a tax exemption warehouse in a number of ways, and that the exemption manager may access the exemption data warehouse by requesting the information from the host system. There is absolutely no mention of the interrelationship between controllers at different hierarchical levels in the manner recited in claim 8. Therefore, even if Sullivan and Gryglewicz could be hypothetically combined, the hypothetical combination of references would

not teach or hint at the subject matter of claim 8. Thus, claim 8 is also non-obvious over Sullivan and Gryglewicz.

Independent claim 15 is allowable for similar reasons as claim 8.

Dependent claims are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (200206980-1).

Respectfully submitted,

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